

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

ONE WISCONSIN INSTITUTE, INC.,
et al.,

15-cv-324-jdp

Plaintiffs,

v.

MARK L. THOMSEN, et al.,

Defendants.

JUSTIN LUFT, et al.,

Plaintiffs,

v.

20-cv-768-jdp

TONY EVERS, et al.,

Defendants.

**DECLARATION OF ANNA DO, ESQ. IN SUPPORT OF *LUFT* PLAINTIFFS'
RESPONSE TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

I, Anna Do, Esq., declare as follows:

1. I am an attorney at law licensed to practice law in California. I am an attorney at Dechert LLP and counsel of record for Plaintiffs. I submit this declaration in support of *Luft* Plaintiffs' Response to Defendants' Motion for Summary Judgment. Unless otherwise stated, I have personal knowledge of all matters stated herein and would competently testify thereto if called upon as a witness.

2. Between August 25, 2020, and September 17, 2020, Plaintiffs have received from Defendants approximately 133,250 documents with a total page count of at least 272,306 pages spread across seven separate productions.

3. Plaintiffs took three depositions on a shortened and expedited basis at Defendants' own request because of the proximity of the election. Each of the deponents sat for only a half day of deposition. At the time of these depositions, Defendants had not completed their productions of documents and had not produced important up-to-date versions of certain documents that are highly relevant to Plaintiffs' claims, such as an internal IDPP guide.

4. In light of the above and due to the expedited timeline, Plaintiffs have not been able to conduct the necessary discovery and obtain the required factual information to respond to all the factual assertions in Defendants' summary judgment brief.

5. Attached hereto as **Exhibit A** is a map of DMV centers and a Milwaukee transit map indicating that the DMV service centers in Milwaukee that remain open are miles apart from one another, with some difficult to access by public transportation.

6. Attached hereto as **Exhibit B** is a map of Kenosha from Google Maps indicating that it takes more than one hour via public transportation to get to the Kenosha DMV service center from downtown Kenosha during the weekday.

7. Attached hereto as **Exhibit C** is a map of Racine from Google Maps showing that it takes at least an hour via public transportation to get to the Racine DMV service center from the center of Racine during the weekday.

8. Attached hereto as **Exhibit S** is a map of Wausau from Google Maps showing that it cannot calculate a route from the center of Wausau to the Wausau DMV service center via public transportation.

9. Attached hereto as **Exhibit D** is a September 1, 2020 DOT press release showing that the Downtown DMV service center located on 6th Street in Milwaukee is currently closed, and that DMV service centers continue to have limited hours.

10. Attached hereto as **Exhibit E** is a printout of the Wisconsin Department of Transportation Division of Motor Vehicles homepage, printed on or about September 21, 2020 at <https://wisconsitdot.gov/Pages/online-srvcs/external/dmv.aspx>, which does not highlight the closure of the Downtown Milwaukee location, but instead displays a banner that says, “DMVs are open for all driver license and ID card customers.”

11. **Exhibit F** is left intentionally blank.

12. **Exhibit G** is left intentionally blank.

13. Attached hereto as **Exhibit H** is a printout of MyVote Wisconsin’s homepage, downloaded on or about September 21, 2020 at <https://myvote.wi.gov/en-us>.

14. Attached hereto as **Exhibit I** is a printout of Wisconsin Department of Transportation’s News webpage with an expanded list of March 2020 releases, downloaded on or about September 21, 2020 at <https://wisconsindot.gov/Pages/about-wisdot/newsroom/default.aspx>.

15. Attached hereto as **Exhibit J** is a printout of Wisconsin Department of Transportation’s News webpage with an expanded list of April 2020 releases, printed on or about September 21, 2020 at <https://wisconsindot.gov/Pages/about-wisdot/newsroom/default.aspx>.

16. Attached hereto as **Exhibit K** is a copy of the Wisconsin Elections Commission’s May 20, 2020 meeting agenda PowerPoint presentation.

17. Attached hereto as **Exhibit L** is a copy of MyVote Wisconsin's webpage entitled "Photo ID Required", downloaded on or about September 22, 2020 at <https://myvote.wi.gov/en-us/PhotoIDRequired>.

18. Attached hereto as **Exhibit M** is a copy of the Wisconsin Elections Commission's Accessibility Advisory Committee Spring 2020 Meeting agenda.

19. Attached hereto as **Exhibit N** is a copy of Wisconsin Elections Commission's Accessibility Advisory Committee Summer 2020 Meeting agenda.

20. Attached hereto as **Exhibit O** is an email from Karyn Rotker to Michael Murphy and Charles Curtis, Jr., dated September 10, 2020.

21. Attached hereto as **Exhibit P** is an email from Michael Murphy to Karyn Rotker and Charles Curtis, Jr., dated September 11, 2020.

22. Attached hereto as **Exhibit Q** is an email from Michael Murphy to Karyn Rotker and Charles Curtis, Jr., dated September 17, 2020.

23. Attached hereto as **Exhibit R** is a copy of the Wisconsin's Elections Commissions July 2016 Absentee Voting in Residential Care Facilities and Retirement Homes document, downloaded on or about September 21, 2020 from https://elections.wi.gov/sites/default/files/publication/65/absentee_voting_in_residential_care_facilities_and_56895.pdf.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing statements are true and correct to the best of my knowledge and belief.

Executed this 22th day of September 2020
at Los Angeles, California.

/s/ Anna Do
Anna Do